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UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:)	Case No.	21-20600-C-11
)	DCN:	RLC-11
)	Date:	
Victoria Gewalt,)	Time:	
)	Dept:	C
Debtor.)	Courtroom:	35
)	Judge:	Klein

**DEBTOR'S EX PARTE APPLICATION FOR ORDER SHORTENING TIME
FOR HEARING ON MOTION TO SELL REAL PROPERTY**

Debtor Victoria Gewalt (Debtor) through her attorney Stephen M. Reynolds, hereby requests that the Court shorten time to allow the hearing of Debtor's Motion to Sell Real Property (RLC-10) on shortened time. Normally 35 days' notice is required. Debtors is requesting that time be shortened to allow the sale motion to be heard on June 23, 2021, at 11:00 a.m. with service to all creditors no later than June 14, 2021, or 9 days' notice. Federal Rule of Bankruptcy Procedure 9006(c) (1) provides that the Court, for cause shown may reduce the time required for a hearing. Eastern District Local Rule 9014(f) (3) similarly provides for hearings on less than fourteen days' notice.

In support of their request, Debtor states as follows:

1. Debtor filed a petition under Chapter 11 Subchapter V on February 22, 2021.

1 2. Debtor remains as Debtor-in-Possession and will be proposing a liquidating
2 Plan of Reorganization that will pay all creditors in full with the sale of California and Texas
3 rental properties.

4 3. It is imperative that the sale proceed on June 23, 2021. Debtor is an experienced real
5 estate investor and developer with thirty years' experience in the field. The property was listed
6 for sale prior to the bankruptcy filing and several lesser offers have been obtained. The all-
7 cash offer requires closing no later than July 15, 2021. The property is subject to a single deed
8 of trust and a prompt sale and closing will minimize interest expense to the benefit of the
9 debtor, the estate, and the creditors of the estate. Further the present superior offer will
10 generate cash for the estate.

11 **WHEREFORE**, Debtor requests that this Court allow for the hearing on Debtor's
12 Motion to Sell Real Property on June 23, 2021, with mailing or other service to all parties to be
13 completed no later than June 14, 2024, opposition if any may be heard at the hearing to
14 approve sale, and for such further relief as the court deems proper.

15 Dated: June 14, 2021

Reynolds Law Corporation


/s/ Stephen M. Reynolds

Stephen M. Reynolds
Attorney for Victoria Gewalt